

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
WILLIAM G. GIBBONS,

Plaintiff,

-against-

LEONARD FRONTON, D.O., STEVEN FEIN,
M.D., STERLING MEDICAL CORPORATION,
DEPARTMENT OF VETERANS AFFAIRS, and
THE UNITED STATES OF AMERICA,

Defendants.
----- x

ECF Case

07 Civ. 2801 (MGC)

REPLY DECLARATION OF
LARRY JOSEPH BRINKMAN

LARRY JOSEPH BRINKMAN, pursuant to 28 U.S.C. § 1746, declares the following
under penalty of perjury:

1. I am currently employed as the Chief of Human Resources for the VA Medical Center in Miami, Florida ("Miami VA Medical Center"), a position I have held since December 2002. Prior to that, I worked as the Assistant Chief of Human Resources for the Miami VA Medical Center from 1995 until 2002. From 1985 until 1995, I worked as the Chief of Labor/Employee Relations at the Miami VA Medical Center.

2. I have had an opportunity to review the medical records submitted along with plaintiff's opposition brief and defendants Fronton and Fine's Affirmation in Opposition to the Government's motion. According to VA Medical Center personnel records, none of the individuals listed in these medical records were employees of the Miami VA Medical Center with the exception of Dr. Robert A. Snyder, who is employed by the Miami VA Medical Center

as a dermatologist and Joann D. Bass, who was employed by the VA Medical Center as an Information Technology specialist before she was separated from employment on May 4, 2003. The following individuals, whose names appear on the medical records, were not employees of the VA Medical Center: Tamyaha A. Blue, Linda Bhim, Donna M. Pixley, Erin L. Robinson.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 8, 2007


LARRY JOSEPH BRINKMAN